

# **EXHIBIT 17**

**ROTHSCHILD CONNECTED DEVICES INNOVATIONS, LLC v. THE COCA-COLA CO.**  
**Highly Confidential Leigh M. Rothschild on 05/12/2017**

1 THE UNITED STATES DISTRICT COURT  
2 FOR THE NORTHERN DISTRICT OF GEORGIA  
3 ATLANTA DIVISION  
4 ROTHSCHILD CONNECTED )  
5 DEVICES INNOVATIONS, LLC, )  
6 Plaintiff, ) C.A. No. 1:16-cv-01241-TWT  
7 v. )  
8 THE COCA-COLA COMPANY, )  
9 Defendant. )  
10 \_\_\_\_\_ )

11 May 12, 2017  
12 10:38 a.m. - 4:20 p.m.  
13 1395 Brickell Avenue  
14 Miami, Florida

15 \*\*\*\*\* H I G H L Y C O N F I D E N T I A L \*\*\*\*\*

16 VIDEOTAPE DEPOSITION OF

17 LEIGH M. ROTHSCHILD

18 Taken on behalf of the Defendant before

19 Michael J. D'Amato, RMR, Notary Public in and for the  
20 State of Florida at Large, pursuant to Notice of Taking  
21 Deposition in the above cause.

22

23

24

25 Job # 163756

1 personalized beverage machine.

2 Q. Okay. Thank you. But you didn't invent a  
3 beverage dispenser, did you?

4 MR. CAREY: Object to form.

5 A. No, sir.

6 Q. So how would you distinguish your invention  
7 from a beverage dispenser?

8 MR. CAREY: Object to form.

9 A. A beverage dispenser, as I understand it as a  
10 consumer, is a machine that you go to the machine and  
11 it will give you your Coke or it will give you your  
12 Pepsi or it will give you your Mountain Dew. But it  
13 won't personalize your beverage.

14 A beverage dispenser at the time that I  
15 invented this invention that's the subject of this  
16 litigation, Mr. Nichols, was not able to personalize  
17 your beverage. It didn't know that Leigh Rothschild  
18 was approaching the machine.

19 It didn't know that Jane Smith was approaching  
20 the machine and that Jane Smith had a certain prestored  
21 desire from now and hopefully in the future that Jane  
22 wanted her Pepsi with a little extra lemon.

23 So that's the difference between the beverage  
24 dispenser that existed that I walked up to and said,  
25 Wow, there's got to be a better way. And the beverage

## 1 CERTIFICATE OF COURT REPORTER

2 I, MICHAEL J. D'AMATO, a Registered Merit Reporter  
3 and Notary Public in and for the State of Florida at  
4 Large, do HEREBY CERTIFY that I was authorized to and  
5 did stenographically report the deposition of LEIGH M.  
6 ROTHSCCHILD; that a review of the transcript was  
7 requested; and that the foregoing transcript, pages from  
8 1 to 186, is a true and accurate record of my  
9 stenographic notes.

10 I FURTHER CERTIFY that I am not a relative,  
11 employee, attorney, or counsel of any of the parties, nor  
12 am I a relative or employee of any of the parties'  
13 attorney or counsel connected with the action, nor am I  
14 financially interested in the action.

15 Dated this 23rd day of May, 2017.  
16  
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19 \_\_\_\_\_  
20 MICHAEL J. D'AMATO,  
21 Registered Merit Reporter  
22  
23  
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